



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
www.epa.gov/region8

**JAN 18 2017**

Ref: 8ENF-AT

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

The Corporation Trust Company, Registered Agent for  
Targa Resources Corp.  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

Re: Clean Air Act, Section 114(a) Information Request to Targa Resources; Blue Buttes, Clarks  
Creek and Junction Compressor Stations

To Whom It May Concern,

Based on 2016 Clean Air Act (CAA or the Act) inspections, the U.S. Environmental Protection Agency hereby requires Targa Resources (Targa) to provide certain information to determine the CAA compliance status of its oil and natural gas production facilities located in North Dakota.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. For the EPA to determine whether a violation of the CAA has occurred, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to Requests 1 and 2 herein within thirty (30) calendar days from receipt of this request. Instructions and definitions are provided in Enclosure 1 and the information being requested is contained within Enclosure 2.

You are required to attach a properly executed Statement of Certification (Enclosure 3) to your response to this request. The statement must be signed and dated. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the Act and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the Act, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this request; 3) the initiation of a civil action pursuant to section 113(b) of the Act, 42 U.S.C. § 7413(b); and/or 4) any other action authorized under the Act. In addition, knowingly providing false information in response to this information request may be actionable under section 113(c) of the Act, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that emission data cannot be claimed as confidential under section 114(c). For detailed instructions, please see Enclosure 4 to this letter. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

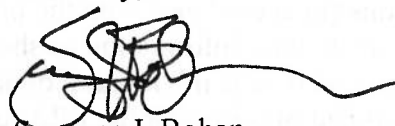
**YOU MUST SUBMIT ALL RESPONSIVE INFORMATION:** *Whether or not you make a claim of confidentiality.*

Please submit your response to this request to:

U.S. Environmental Protection Agency, Region 8  
Technical Enforcement Program  
Office of Enforcement, Compliance and Environmental Justice  
1595 Wynkoop Street  
Denver, Colorado 80202-1129  
Attention: Michael Stovern

If you have any questions regarding this Information Request, please contact Michael Stovern, at 303-312-6635, or your counsel may contact Max Greenblum, at 303-312-6108.

Sincerely,



Suzanne J. Bohan  
Assistant Regional Administrator  
Office of Enforcement, Compliance and  
Environmental Justice

Enclosures

- 1) Instructions and Definitions
- 2) Information Requested
- 3) Statement of Certification
- 4) Confidential Business Information

cc: The Honorable Mark Fox, Chairman, MHA Nation  
Kari Mossett, Executive Assistant, MHA Nation  
Lisa H. Lone Fight, M.S., Senior Scientific Advisor, MHA Nation  
Allen Nygard, Chief Executive Officer, MHA Nation  
Carson Hood, Director, MHA Energy Division  
Edmund Baker, Environmental Director, MHA Nation  
Dan C. Middlebrooks, Executive Vice President, Targa Resources  
Max Greenblum, EPA-Region 8  
Michael Stovern, EPA-Region 8  
Alexis North, EPA-Region 8  
(w/encl. to ea.)

## **ENCLOSURE 1:**

### **A. INSTRUCTIONS**

1. Provide a separate narrative response to each request and subpart set forth in the Information Request. If Targa has no responsive information or documents pertaining to a particular request, submit an affirmative statement and explanation.
2. Precede each answer with the number of the request to which it corresponds and at the end of each answer identify the person(s) (including name, title, and a description of job duties) that provided information that was used or considered in responding to that request, as well as each person (including name, title, and a description of job duties) who was consulted in the preparation of that response.
3. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the request to which it corresponds. If a document is responsive to more than one request, this must be so indicated and only one copy of the document needs to be provided.
4. Targa may choose to either submit documents in .pdf format or submit documents as hard copy documents. Electronic submissions are preferred to save paper and expenses.
5. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner and the basis for the number provided (e.g., estimated, measured or engineering judgment).
6. Where documents or information necessary for a response are neither in Targa's possession nor available to Targa, indicate in your response why such documents or information are not available or in Targa's possession and identify any source that either possesses or is likely to possess such documents or information.

### **B. DEFINITIONS**

All terms used in this information request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401 *et seq.*; 40 C.F.R. Part 63, Subpart HH; 40 C.F.R. Part 63, Subpart ZZZZ; and/or other CAA implementing regulations.

*Four-Stroke Engine* means any type of engine which completes the power cycle in two crankshaft revolutions, with intake and compression strokes in the first revolution and power and exhaust strokes in the second revolution.

*Gas-Condensate-Glycol (GCG) Separator* means a two- or three-phase separator through which the "rich" glycol stream of a glycol dehydration unit is passed to remove entrained gas and hydrocarbon liquid. The GCG separator is commonly referred to as a flash separator or flash tank.

*Glycol Dehydration Unit* means a device in which a liquid glycol (including, but not limited to, ethylene glycol, diethylene glycol, or triethylene glycol) absorbent directly contacts a natural gas stream and absorbs water in a contact tower or absorption column (absorber). The glycol contacts and

absorbs water vapor and other gas stream constituents from the natural gas and becomes “rich” glycol. This glycol is then regenerated in the glycol dehydration unit reboiler. The “lean” glycol is then recycled.

*Gpm* means gallon per minute

*MMscf* means million standard cubic feet

*Potential To Emit (PTE)* means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the stationary source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

*Rich Burn Engine* means any four-stroke spark ignited engine where the manufacturer's recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio at full load conditions is less than or equal to 1.1. Engines originally manufactured as rich burn engines, but modified prior to June 12, 2006, with passive emission control technology for NO<sub>x</sub> (such as pre-combustion chambers) will be considered lean burn engines. Also, existing engines where there are no manufacturer's recommendations regarding air/fuel ratio will be considered a rich burn engine if the excess oxygen content of the exhaust at full load conditions is less than or equal to 2 percent.

*Lean Burn Engine* means any two-stroke or four-stroke spark ignited engine that does not meet the definition of a rich burn engine.

*Site-Rated Horsepower* means the maximum manufacturer's design capacity at engine site conditions.

*Stationary Reciprocating Internal Combustion Engine (RICE)* means any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

*Two-Stroke Engine* means a type of engine which completes the power cycle in single crankshaft revolution by combining the intake and compression operations into one stroke and the power and exhaust operations into a second stroke. This system requires auxiliary scavenging and inherently runs lean of stoichiometric.

## **ENCLOSURE 2:**

### **INFORMATION REQUESTED:**

Using the instructions and definitions set forth in Enclosure 1, provide the following information within the time periods specified previously.

1. Please provide the following information:

- a) Provide a list of all *Stationary RICE* that are currently located at Clarks Creek compressor station, Junction compressor station and Blue Buttes compressor station. For each engine at each facility, provide the make, model, serial number, year of manufacture, whether it is a *Four-Stroke Engine* or *Two-Stroke Engine* and whether it is a *Lean Burn Engine* or *Rich Burn Engine*.
- b) For each *Stationary RICE* listed in 1.a, provide:
  - i. The current operating status of the engine and the total hours of operation during the 2016 calendar year.
  - ii. A copy of the manufacturer site specific technical data sheet that includes engine emission factors and *Site-Rated Horsepower*. If the facility used derated engine horsepower for determining *Potential To Emit (PTE)*, please provide the engine manufacturer documentation used to determine engine deration.
  - iii. A description of any equipped control device(s)? The description shall include the make, model and date of install of the control device(s).
  - iv. If a method other than engine manufacturer provided emission factors were used for determining the unit's *PTE*, provide all associated information that was used to calculate each engine's *PTE*.
  - v. Any performance test reports from the last 5 years.

2. Please provide the following information:

- a) Provide a list of all *Glycol Dehydration Units* that are currently located at Clarks Creek compressor station, Junction compressor station and Blue Buttes compressor station. For each *Glycol Dehydration Unit*, provide the make, model and maximum dry gas flow rate [MMscf/day].
- b) For each *Glycol Dehydration Unit* listed in 2.a, provide:
  - i. The results of the most recent extended gas analyses (including benzene, ethylbenzene, toluene, and xylene) representative of the natural gas stream entering the absorber/contact tower of the *Glycol Dehydration Unit* and any revised GRI-GLYCalc 4.0 model emission calculations (include the Input Summary and the Aggregate Report). The extended gas analysis lab results shall include the GRI-GLYCalc 4.0 wet gas composition input format (i.e. Carbon

Dioxide, Hydrogen Sulfide, Nitrogen, Methane, Ethane, Propane, Isobutane, N-Butane, Isopentane, N-pentane, Cyclopentane, Other hexanes, Heptanes, Methylcyclohexane, 2,2,4 – trimethylpentane, Benzene, Toluene, Ethylbenzene, Xylenes, C8+ Heavies), date and time of sample collection and the temperature [°F] and pressure [psig] of the sample. Describe where, within the compression and dehydration process, the sample was collected. If existing extended gas analyses that meet the specifications listed above do not exist, Pecan shall conduct such analyses and provide the results.

- ii. The annual average inlet wet gas temperature [°F] and pressure [psig] for calendar year 2016 and the temperature and pressure values used in the most recent Title V permit application *PTE* calculations.
- iii. Is the inlet gas saturated? If not, what is the water content of the gas [lb H<sub>2</sub>O/MMscf]?
- iv. The 2016 annual average dry gas flow rate [MMscf/day] and water content [lbs H<sub>2</sub>O/MMscf]. If the *Glycol Dehydration Unit* has absorber stages, provide the number of stages.
- v. The water content [wt% H<sub>2</sub>O] of the lean glycol and either the 2016 annual average flow rate [gpm] or Recirculation ratio [gal/lb H<sub>2</sub>O] of the lean glycol.
- vi. The make, model and maximum available flow rate (gpm) of each recirculation pump associated with the *Glycol Dehydration Unit*. For each glycol recirculation pump, indicate whether it is electric, pneumatic or gas injection? If the pump is gas injection, provide the gas injection pump volume ratio [acfm gas/gpm glycol].
- vii. Does the *Glycol Dehydration Unit* include a *GCG Separator* (flash tank)? If so, what is the operating temperature [°F] and pressure [psig]?
- viii. Does the *Glycol Dehydration Unit GCG Separator* (flash tank) have controls? If so, please provide a description of the controls for the flash tank vapors?
- ix. Does the *Glycol Dehydration Unit* utilize a stripping gas? If so, what is the source of the stripping gas (i.e. dry gas, flash gas, nitrogen) and the stripping gas flow rate [scf/min]?
- x. Does the *Glycol Dehydration Unit* reboiler have a condenser as a control device? If so, what is the make, model and operating temperature [°F] and pressure [psig] of the condenser?
- xi. Does the *Glycol Dehydration Unit* reboiler have a combustion device as a control device? If so, what is the make, model and destruction efficiency of the combustion device?

- xii. Does the *Glycol Dehydration Unit* reboiler reroute emissions using a closed vent system to the inlet of the process (i.e. a closed loop system for reboiler emissions)? If so, provide a narrative of the venting process and a digital photograph with date and time stamp showing the closed vent system.

3. Please provide the following information:

- a) Any documentation and the associated submittal dates of all proposed, pending and/or finalized permits that include federally enforceable emission limits that apply to either the *Stationary RICE* or *Glycol Dehydration Units* located at the Clarks Creek compressor station, Junction compressor station and Blue Buttes compressor station.



**ENCLOSURE 3**

**STATEMENT OF CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

## **ENCLOSURE 4**

### **Confidential Business Information (CBI) Assertion and Substantiation Requirements**

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(d). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.

2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Max Greenblum  
U.S. EPA Region 8  
1595 Wynkoop Street (ENF-L)  
Denver, CO 80202-1129  
(303) 312-6108

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.